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July 11, 2023

VIA ECF

Hon. Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: ***Vinci Brands, LLC v. Coach Services, Inc.***, Case No. 1:23-CV-05138

Dear Judge Schofield,

I write on behalf of Plaintiff, Vinci Brands, LLC (“Vinci”) in the above captioned matter. I write to respectfully request that this Court grant leave to file Vinci’s Motion to Seal Reply Brief and Accompanying Exhibits (ECF 80); Memorandum of Law in Support re: 80 Motion to Seal Reply Brief and Accompanying Exhibits (ECF 81 and 82); and Reply to Response to Motion re: 17 Motion for Order to Show Cause for Preliminary Injunction and Temporary Restraining Order (ECF 83). Vinci also requests that this Court permit leave to strike ECF 80 and re-file the same.

Vinci experienced trouble filing the above-referenced papers, including several under seal, on the night of July 10, 2023, which resulted in Vinci’s filing the papers shortly after the midnight deadline (all papers were filed by approximately 1:30 am on July 11, 2023). Vinci then learned early this afternoon from counsel for Coach Services, Inc, Kate Spade LLC, and Tapestry, Inc. (“Kate Spade Defendants”) that the Reply (ECF 83) was for some reason not accessible to them. After contacting the Clerk’s office and Chambers several times to try to fix the inaccessibility, the Court’s Courtroom Deputy advised that the proper way to resolve this issue is to move to strike and re-file the Reply. In the meantime, we have sent courtesy copies of the Reply and exhibits to counsel for Kate Spade Defendants as well as counsel for Defendant Case-Mate, Inc.

Vinci therefore respectfully requests that it be granted leave to file its Motion to Seal Reply Brief and Accompanying Exhibits (ECF 80); Memorandum of Law in Support re: 80 Motion to Seal Reply Brief and Accompanying Exhibits (ECF 81 and 82); and Reply to Response to Motion re: 17 Motion for Order to Show Cause for Preliminary Injunction and Temporary Restraining Order (ECF 83), and leave to strike and re-file the Reply (ECF 83) so as to ensure all parties have access to the filings online.

Respectfully submitted,
BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

Hon. Lorna G. Shofield

July 11, 2023

Page 2

/s/ Michael A. Vatis

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